

**THE OFFICE OF REGULATORY STAFF
SURREBUTTAL TESTIMONY**

OF

DAWN M. HIPPIE

AUGUST 31, 2011



DOCKET NO. 2011-47-WS

**Application of Carolina Water Service,
Incorporated for Approval of an Increase in Its
Rates for Water and Sewer Services Provided to
All of Its Service Areas in South Carolina**

SURREBUTTAL TESTIMONY OF DAWN M. HIPPI

FOR

THE OFFICE OF REGULATORY STAFF

DOCKET NO. 2011-47-WS

IN RE: APPLICATION OF CAROLINA WATER SERVICE, INCORPORATED

FOR APPROVAL OF AN INCREASE IN ITS RATES FOR WATER AND

SEWER SERVICES PROVIDED TO ALL OF ITS SERVICE AREAS IN SOUTH

CAROLINA

**Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND
OCCUPATION.**

A. My name is Dawn M. Hipp. My business address is 1401 Main Street,
Suite 900, Columbia, South Carolina 29201. I am employed by the state of South
Carolina as the Director of the Telecommunications, Transportation, Water and
Wastewater Departments for the Office of Regulatory Staff ("ORS").

**Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY IN
THIS PROCEEDING?**

A. The purpose of my surrebuttal testimony in this proceeding is to respond
to specific portions of rebuttal testimony provided by the following witnesses for
Carolina Water Service, Inc. ("CWS"):

1 CWS witness Mr. Steven Lubertozi

2 I will focus on Mr. Lubertozi's rebuttal testimony related to:

- 3 1) The ORS revision to CWS's pass through language;
- 4 2) The amount of alleged unrecovered expense related to
- 5 modification of the pass through language; and
- 6 3) The ORS adjustment to the Customer Care and Billing System
- 7 ("CC&B").

8 CWS witness Mr. Patrick Flynn

9 I will address Mr. Flynn's proposal to modify the CWS pass through

10 language and CWS's non-account water analysis.

11 CWS witness Ms. Karen Sasic

12 I will address Ms. Sasic's rebuttal testimony related to:

- 13 1) The concern that ORS did not use the appropriate number of
- 14 Equivalent Residential Connections ("ERC") to calculate a
- 15 reduction in CWS CC&B cost;
- 16 2) CWS compliance with the return of interest on customer
- 17 deposits;
- 18 3) CWS compliance with customer bill form requirements and
- 19 continued billing errors;
- 20 4) CWS's practice of requesting payment from a customer after
- 21 the maximum six (6) months allowed by Commission regulations;
- 22 and

1 5) The CWS response to ORS concerns that CWS is not billing all
2 of its customers.

3 **Surrebuttal related to CWS witness Mr. Steven Lubertozzi**

4 **Q. DO OTHER WATER AND WASTEWATER UTILITIES REGULATED**
5 **BY THIS COMMISSION TREAT NON-REVENUE WATER AS A COST**
6 **OF SERVICE?**

7 A. Yes. Kiawah Island Utilities, Inc. (“KUI”) and CUC, Inc. (“CUC”) have
8 pass through language approved by this Commission for water supply services.
9 These companies use the effective rate from their third-party provider as the rate
10 charged to their customers for water supply services. Both KUI and CUC treat
11 non-revenue water as a cost of service. While I understand CWS does not favor
12 this approach, ORS initially suggested this approach for two (2) reasons:

13 1) CWS does not have an active water audit and loss control program in place to
14 accurately identify its historical or current non-revenue water on a system-by-
15 system basis; and

16 2) CWS is not billing all of its active customers and this error skews the
17 customer water consumption data produced by CC&B.

18 Based on the lack of historical and accurate non-revenue water statistics and the
19 poor data integrity of CC&B, ORS could not determine a specific methodology
20 that would balance the needs of CWS and the customer while incenting CWS to
21 improve its business practices and address the high levels of non-revenue water. I
22 will address Mr. Flynn’s proposed methodology later in my surrebuttal testimony.

1 **Q. DO YOU AGREE WITH MR. LUBERTOZZI'S ANALYSIS OF THE**
2 **AMOUNT CWS WOULD NOT RECOVER IF THE COMMISSION WERE**
3 **TO ADOPT THE PASS THROUGH METHODOLOGY PROPOSED BY**
4 **MR. FLYNN?**

5 A. No. Mr. Lubertozi states in his rebuttal testimony (Lubertozi rebuttal
6 page 3, lines 4 and 5) that he "analyzed the test year and determined CWS would
7 not recover \$64,010." However, Exhibit SML No.1 attached to Mr. Lubertozi's
8 rebuttal testimony demonstrating his analysis indicates it is "For the 12 months
9 ended December 31, 2010." CWS identified a test year ending September 30,
10 2010 in its application. His unrecovered cost analysis is not reflective of the test
11 year.

12 **Q. IF THE COMMISSION WERE TO ADOPT THE CWS PROPOSAL TO**
13 **MODIFY THE PASS THROUGH LANGUAGE AS DESCRIBED IN MR.**
14 **PATRICK FLYNN'S REBUTTAL TESTIMONY, DOES ORS AGREE**
15 **THAT NON-REVENUE WATER SHOULD BE INCLUDED IN THE COST**
16 **OF SERVICE AS SUGGESTED BY MR. LUBERTOZZI?**

17 A. No. ORS would not agree that CWS should be able to increase the water
18 supply charge by a percentage to account for non-revenue water and be allowed to
19 recover non-revenue water in excess of 15% as a cost of service. This proposal
20 provides CWS no incentive to correct its operational deficiencies to reduce its
21 non-revenue water and inflow and infiltration ("I&I").

1 **Q. WILL THE MODIFICATION TO THE PASS THROUGH LANGUAGE**
2 **PROPOSED BY ORS IMPROVE THE TIMELINESS AND ACCURACY**
3 **OF CUSTOMER BILLS?**

4 A. Yes. CWS customers have been subject to inaccurate and untimely billing
5 since June of 2008. CWS's use of the pro rata share methodology certainly
6 introduces a delay since CWS uses a manual process to calculate the water supply
7 and/or wastewater treatment charge which is dependent on a monthly service bill
8 issued by the third-party provider. However, CWS knew as it was designing the
9 CC&B system that this billing nuance existed in South Carolina and it would
10 impact its customers. During the design and implementation of CC&B, CWS
11 should have taken steps to ensure its new billing system was able to issue all
12 customers timely and accurate bills. If a company cannot issue accurate invoices
13 in a timely manner, its operating cash flow will be affected.

14 ORS provided CWS sufficient time to cure the billing deficiencies
15 affecting its customers by whatever means it needed, including requesting a
16 change in its pass through calculation methodology from the Commission.
17 Instead of proactively correcting the deficiencies, CWS allowed the inefficient
18 and error-riddled manual processes to continue to impact its water distribution
19 and wastewater collection customers from 2008 until present. Only after ORS
20 filed a rule to show cause petition with the Commission (Docket No. 2010-146-
21 WS), did CWS institute some limited measures to track customer billing and
22 improve some of its internal processes to increase timeliness. It is disingenuous
23 for Mr. Lubertoizzi to claim that the CC&B system was operating properly in all

1 aspects during the test year when CWS customers did not receive timely or
2 accurate monthly service bills, which has been admitted by CWS witness Ms.
3 Karen Sasic (Sasic direct testimony pages 7-11).

4 While the proposed modification to the pass through language may
5 alleviate the manual process, ORS proposes to remove 74.65% of the initial cost
6 of the CC&B system because its flawed design and poor implementation did not
7 render the system useful to customers during the test year. Mr. Lubertozzi
8 implies in his rebuttal testimony (Lubertozzi rebuttal testimony page 5, line 19-
9 21) that ORS did not challenge the manual processes used by CWS in its last rate
10 case. ORS notes that CWS was using its Legacy billing system to invoice
11 customers during the last rate case (2006).

12 **Surrebuttal related to CWS witness Mr. Patrick Flynn**

13 **Q. WHAT IS ORS'S RESPONSE TO THE CWS PROPOSAL TO IMPROVE**
14 **TIMELY AND ACCURATE BILLING TO ITS WATER DISTRIBUTION**
15 **CUSTOMERS?**

16 A. While the CWS proposal does not address wastewater collection
17 customers who receive wastewater treatment from a third-party provider, the
18 proposal, as modified by ORS's recommendations, should improve the billing
19 timeliness and accuracy. The proposal outlined by Mr. Flynn (Flynn rebuttal
20 testimony pages 3-4, lines 1-13) is a step in the right direction.

21 **Q. DOES ORS RECOMMEND THE COMMISSION CONSIDER ANY**
22 **ADJUSTMENTS TO THE CWS PROPOSAL?**

1 A. Yes. ORS would propose the Commission consider the following
2 adjustments to the CWS proposal to change the pass through language for water
3 distribution customers who receive water supply services from a third-party
4 provider:

5 1) For a period of twelve (12) months after the effective date of the
6 Commission Order, CWS may collect from customers (excluding those in
7 the York County Service Territory) a water supply charge based upon
8 **110%** of the effective price per thousand gallons from the third-party
9 water provider (exclusive of any base facilities charge);

10 2) CWS will identify clearly on the bill form the water supply price and
11 the base facilities charge from the third-party water provider and the
12 percentage of non-revenue water approved by the Commission to collect
13 from its customers;

14 3) CWS will not be allowed to recover expenses exceeding the percentage
15 of non-revenue water approved by the Commission as a cost of service;

16 4) CWS shall supply the ORS quarterly and annual reports on its water
17 balance calculation separated by each purchased water system in a format
18 specified by ORS;

19 5) CWS shall complete a water audit of each water system served by
20 purchased water within 12 months of the Commission order approving the
21 proposal;

22 6) CWS shall annually provide the Commission and ORS with the results
23 of water audits on each water system served by purchased water, a

corrective action plan to address non-revenue water that exceeds 10%,
and/or request to adjust the 110% water supply charge; and

7) CWS and ORS shall publish on their websites the quarterly and annual
reports on the CWS water balance, along with any ORS recommendations.

**Q. IF THE COMMISSION WERE TO APPROVE THE CHANGE TO THE
PASS THROUGH LANGUAGE FOR WATER SERVICE AS PROPOSED
BY CWS WITH ALL OF ORS'S ADJUSTMENTS OUTLINED ABOVE,
WHAT PERCENTAGE OF NON-REVENUE WATER DOES ORS
RECOMMEND THE COMMISSION ALLOW CWS TO RECOVER
DURING THE FIRST 12 MONTHS?**

A. ORS recommends the Commission allow CWS to recover 10% of its non-revenue water. As Mr. Flynn identified in his rebuttal testimony (page 4, line 16), the American Water Works Association ("AWWA") has backed away from a "one-size-fits-all" non-revenue water standard. For clarification, the AWWA Manual of Water Supply Practices (M36): Water Audits and Loss Control Programs defines non-revenue water as "unbilled authorized consumption, apparent losses, and real losses." Authorized consumption includes water consumed in activities such as fire fighting and main flushing. The distinction between apparent and real losses is the following: 1) an apparent loss is a loss that results in uncaptured revenue (i.e. billing errors, water theft); and 2) a real loss is a physical loss of the water resource (i.e. leakage).

CWS has not yet implemented a formal water audit program and has no reliable non-revenue water statistics. Those facts combined with the data integrity

1 issues due to active customers not being billed by CWS, do not provide an
2 equitable basis to determine the actual percentage of non-revenue water for CWS
3 water systems. Based on Mr. Flynn's Rebuttal Exhibit AWWA-State Survey
4 2002 Table 2 Selected State Standards for Unaccounted-for Water, the
5 Department of Health and Environmental Control ("DHEC") and this
6 Commission identified a range of 7.5% – 10% for unaccounted-for water. ORS
7 recommends the Commission allow CWS to recover 10% non-revenue water in
8 keeping with the top end of the range published in Mr. Flynn's Rebuttal Exhibit.

9 ORS's recommendation to allow CWS to recover 10% of its non-revenue
10 water as a percent "add-on" to the water supply charge from the third-party
11 providers for the first twelve (12) months provides a beneficial balance to both the
12 consumer and CWS. First, it would allow CWS to recover a reasonable amount
13 of non-revenue water while it completes a water audit of each water system
14 served by purchased water. Second, it limits the potential of overcharging the
15 customers. Finally, it encourages CWS to resolve the deficiencies (i.e. inaccurate
16 billing and system leakage) that are contributing to excessive non-revenue water
17 and decrease its non-revenue water using best practices.

18 **Q. DOES ORS RECOMMEND A CHANGE TO THE PASS THROUGH**
19 **LANGUAGE FOR WASTEWATER SERVICES?**

20 **A.** Yes. ORS recommends the Commission adopt the changes to the pass
21 through language as proposed in my direct testimony filed on August 24, 2011,
22 for wastewater collection customers.

1 **Q. WHY DID ORS'S RECOMMENDATIONS EXCLUDE CUSTOMERS IN**
2 **THE YORK COUNTY SERVICE TERRITORY?**

3 A. The CWS contract with York County already contains a provision that
4 limits the amount of non-revenue water that can be passed through to the
5 customers in that service area. Since this safeguard already exists, ORS
6 recommends the revised pass through language include an exception for the York
7 County service territory.

8 **Surrebuttal related to CWS witness Ms. Karen Sasic**

9 **Q. WHAT IS AN EQUIVALENT RESIDENTIAL CONNECTION ("ERC")**
10 **AND HOW IS IT USED BY CWS?**

11 A. ERC is a term used by the AWWA to measure the maximum demand a
12 customer could place on a water or wastewater system. Utilities, Inc. uses the
13 ERC as a basis to allocate costs and assets to its operating subsidiaries and
14 calculate billing units to compute service revenue. Ms. Sasic is correct that ORS
15 relied on the data provided by CWS in ORS Information Request 1.42 to:
16 calculate water and wastewater service revenue; to reduce the portion of expenses
17 for CC&B related to water distribution and wastewater collection customers; and
18 to create Exhibit DMH-1. CWS, in its response to 1.42 which identified
19 customers by billing unit and its proposed rate schedule, uses the term Single
20 Family Equivalent ("SFE") instead of ERC. It is reasonable to use the same data
21 related to customer billing units and cost/asset allocation to determine the
22 equitable reduction in the CC&B cost as the system was not useful to customers
23 during the test year. In addition, Ms. Sasic has provided no evidence to support

1 her assertion the values ORS used to calculate revenue or its reduction to the
2 CC&B costs is incorrect.

3 **Q. DID ORS USE THE SAME CUSTOMER BILLING DATA PROVIDED BY**
4 **CWS TO CALCULATE ITS TEST YEAR AND PROPOSED SERVICE**
5 **REVENUE?**

6 A. Yes. Ms. Kirsten Weeks accepted all of the service revenue adjustments
7 made by ORS (Weeks rebuttal testimony page 2, line 10) which were based on
8 the SFE values which Ms. Sasic indicates are incorrect.

9 **Q. BASED ON MS. SASIC'S ACKNOWLEDGEMENT THAT CWS'S BILL**
10 **FORM WAS OUT OF COMPLIANCE WITH THE COMMISSION**
11 **REGULATIONS, DOES ORS HAVE ANY FURTHER COMMENT?**

12 A. Yes. Ms. Sasic acknowledges in her rebuttal testimony that the bills
13 issued to customers during the test year were not in compliance with the
14 Commission regulations. The errors contributing to the bill form non-compliance
15 were chronic errors that affected CWS customers during the test year. Ms. Sasic
16 indicates that CWS changed a line item description in CC&B resulting in the
17 water supply charge rate per thousand gallons being omitted from customer bills.
18 Based on the ORS review, this bill form error occurred from November 2010
19 through 2011. ORS has not determined if the correction instituted by CWS, as
20 indicated in Ms. Sasic's rebuttal testimony (Sasic rebuttal testimony page 5, lines
21 14-19), has brought the CWS bill form into compliance. Again, it appears that
22 CWS did not contemplate the Commission's regulations regarding customer bill

1 forms and did not design CC&B and its internal processes to ensure compliance
2 with this requirement.

3 **Q. HOW LONG HAVE CWS CUSTOMERS BEEN SUBJECTED TO**
4 **UNTIMELY AND INACCURATE MONTHLY BILLS ISSUED BY CC&B?**

5 A. CWS implemented CC&B in June of 2008. Since that time, customers
6 have complained to ORS and this Commission regarding delays in receiving bills
7 and bills that were incomplete and incorrect. Ms. Sasic's rebuttal testimony (page
8 3, lines 4-8) would imply that the billing issues affecting CWS customers were
9 confined to the test year and all billing issues have been corrected by CWS. This
10 is not the case. ORS filed a rule to show cause proceeding in May 2010 (Docket
11 No. 2010-146-WS) which contained numerous customer bills with obvious errors.
12 The evidence provided in that case demonstrates the billing issues existed prior to
13 the test year. In addition, based on customer testimony at the Lake Wylie night
14 hearing held on August 4, 2011, ORS discovered that CWS overcharged 274
15 customers in the Lake Wylie service area in January 2011 (Surrebuttal Exhibit
16 DMH-1). The inaccurate billing of the base facilities charge to customers
17 demonstrates that CWS internal billing processes and CC&B are not stabilized. It
18 is not unreasonable for customers to expect timely and accurate monthly billing.

19 **Q. DURING THE LAKE WYLIE NIGHT HEARING ON AUGUST 4TH, MR.**
20 **DON LONG PRESENTED TESTIMONY RELATED TO A CWS BILLING**
21 **ERROR WHICH RESULTED IN AN ALLEGED OVERCHARGE**
22 **AFFECTING YORK COUNTY CUSTOMERS. DID ORS INVESTIGATE**

**THIS BILLING ERROR AND WHAT ARE THE FINDINGS OF THE ORS
INVESTIGATION?**

A. Yes. ORS investigated Mr. Long's concern and has confirmed that the billing error discovered by Mr. Long occurred. According to Mr. Long's testimony, when CWS converted to the CC&B system, it inaccurately loaded the York County water supply rate into the CC&B billing module. The York County water supply rate is \$3.26 per thousand gallons of water. In addition, CWS passes through the base facilities charge from York County and that amount is \$0.15 per month. It appears that CWS loaded the incorrect rate of \$3.41 ($\$3.26 + \0.15) per thousand gallons into CC&B as the water supply rate to be charged to customers in the York County service territory (Surrebuttal Exhibit DMH-2). This error resulted in an overcharge to customers of \$0.15 per thousand gallons of water consumed.

CWS has acknowledged this error occurred in 2008 and continued through August 2011. CWS stated it will take the appropriate steps to credit/refund the affected customers any monies due. ORS requested CWS provide specific information in order for ORS to confirm the credit/refund to customers is completed properly. To date ORS has not received the requested information from CWS and ORS cannot confirm the total amount of the credit/refund due to the affected customers in the York County service territory.

**Q. BASED ON CWS'S ACKNOWLEDGEMENT THAT THE COMPANY
FAILED TO RETURN INTEREST ON CUSTOMER DEPOSITS IN
ACCORDANCE WITH COMMISSION REGULATIONS, DOES ORS**

1 **HAVE ANY CONCERNS ABOUT THE DESIGN AND**
2 **IMPLEMENTATION OF CC&B?**

3 A. It is concerning to ORS that CWS recognized an error in their process to
4 refund interest on customer deposits during this rate case. CWS should be
5 knowledgeable of all Commission rules and regulations. Again, it appears that
6 CWS did not contemplate the Commission's regulations requiring CWS to pay
7 interest on customer deposits every two (2) years and did not design CC&B in
8 order to meet this requirement.

9 **Q. DO THE COMMISSION REGULATIONS, 26 S.C. CODE ANN. REGS.**
10 **103-533 AND 103-733 ENTITLE CWS TO REQUEST PAYMENT FROM A**
11 **CUSTOMER IN THE EVENT CWS INADVERTENTLY**
12 **UNDERCHARGES A CUSTOMER FOR A PERIOD LONGER THAN SIX**
13 **(6) MONTHS?**

14 A. No. The Commission regulation is clear that CWS may not request from a
15 customer to recover the inadvertent undercharge for a period exceeding six (6)
16 months. The customer is not aware of every Commission regulation applying to
17 its water and/or wastewater utility; therefore the customer's acknowledgement of
18 service during a period exceeding six (6) months does not provide CWS with an
19 exemption from the Commission regulations. In order to receive a waiver of the
20 Commission regulations, CWS must petition the Commission.

21 **Q. DID ORS PROVIDE CWS PERSONNEL WITH THE ADDRESSES OF**
22 **THE NINE (9) PREMISES THAT WERE RECEIVING SERVICES BUT**
23 **NOT RECORDED IN THE CC&B SYSTEM AND NOT BILLED BY CWS?**

1 A. Yes. The nine (9) premises were discovered by ORS during the site visits
2 conducted on July 18, 20, 21, and 26, 2011. In each instance, ORS and CWS
3 personnel were present and the premise was verified against the CC&B system by
4 a CWS employee. CWS personnel were briefed at the close of each day of ORS
5 site inspections as to what issues needed to be resolved. The lack of
6 communication between CWS field operations and CWS billing staff has resulted
7 in data integrity issues in CC&B, poor customer account management, and an
8 impact on CWS revenue recovery.

9 **Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

10 A. Yes it does.



SURREBUTTAL EXHIBIT DMH-1

Carolina Water Service Inc of SC
Phone: (800) 272-1919
Collections: (800) 272-1919
Customer Service: (800) 272-1919
www.uiwater.com

Bill Date	Account Number	Due Date	Please Pay:
01/30/2011	[REDACTED]	2/24/2011	\$99.91

Name [REDACTED]
Service Address 8 MISCHIEF ST, LAKE WYLIE, SC, 29710
Activity Since Last Bill

Primary Telephone # [REDACTED]

Previous Balance	\$76.66
Payments received as of 01/30/2011	\$-76.66
Balance as of 01/30/2011	\$0.00

Residential Purchased Water

Water Distribution Base Charge	\$13.31
Distribution Usage of 6,090 gallons at \$2.03 per 1,000 gallons	\$12.36
York County Supply Charge	\$20.03
SC DHEC Fee	\$0.88
Total Residential Purchased Water	\$46.58

York County Residential Wastewater Treatment

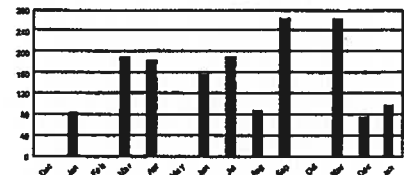
Wastewater Collection	\$30.84
Usage of 6,090 gallons	\$22.17
York County Wholesale Wastewater Base Charge	\$0.32
Total York County Residential Wastewater Treatment	\$53.33
Total Amount Due	\$99.91

Summary of Service

Meter Reading	Meter #	97822652
Current	1338490	01/28/2011
Previous	1330400	12/23/2010
Usage	6,090 Gallons	
Number of Days:	36	
Average Daily Use:	169 Gallons	
Average Daily Cost:	\$2.78	

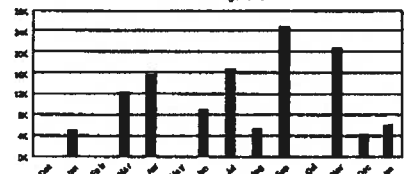
Billing History

in dollars



Consumption History

in gallons



A fee of 1.5% per month will be added if unpaid by the due date.
Make check payable to: Carolina Water Service Inc of SC

Messages

The Company is under the jurisdiction of the PSC. You may contact the ORS at 800-922-1531 with any complaints that remain unresolved after 7 days.
Paperless billing is now available. Please visit our Web Self Service site where you can obtain account information and register for paperless billing.
The site may be accessed by going to <http://www.uiwater.com/myaccount>.

349



PO BOX 160609
Altamonte Springs, FL 32716



Account Number:	[REDACTED]	Amount Paid
Due Date:	2/24/2011	
Please Pay:	\$99.91	

8 MISCHIEF ST
LAKE WYLIE SC 29710

Carolina Water Service Inc of SC
PO Box 11025
Lewiston ME 04243-9476
|||

☐ Address correction requested on back



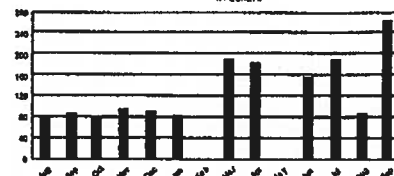
SURREBUTTAL EXHIBIT DMH-2

Carolina Water Service Inc of SC
Phone: (800) 272-1919
Collections: (800) 272-1919
Customer Service: (800) 272-1919
www.uhwater.com

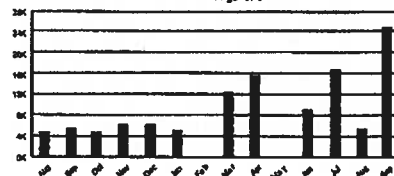
Summary of Service

Meter Reading	Meter #	97822652
Current	1305130	09/26/2010
Previous	1280220	08/27/2010
Usage	24,910 Gallons	
Number of Days:	30	
Average Daily Use:	830 Gallons	
Average Daily Cost:	\$8.80	

Billing History
in dollars



Consumption History
in gallons



Bill Date	Account Number	Due Date	Please Pay:
09/29/2010	[REDACTED]	10/25/2010	\$74.91

Name [REDACTED] Primary Telephone # [REDACTED]

Service Address 8 MISCHIEF ST, LAKE WYLIE, SC, 29710

Activity Since Last Bill

Previous Balance	\$279.74
Payments received as of 09/29/2010	\$-468.85
Balance as of 09/29/2010	\$-189.11

Residential Purchased Water

Water Distribution Base Charge	\$11.09
Distribution Usage of 24,910 gallons at \$2.03 per 1,000 gallons	\$50.57
Water Supply Charge of 24,910 gallons at \$0.00341 per gallon	\$84.94
SC DHEC Fee	\$0.73
Total Residential Purchased Water	\$147.33

York County Residential Wastewater Treatment

Wastewater Collection	\$25.70
Usage of 24,910 gallons	\$90.67
York County Wholesale Wastewater Base Charge	\$0.32
Total York County Residential Wastewater Treatment	\$116.69

Total Amount Due \$74.91

A fee of 1.5% per month will be added if unpaid by the due date.
Make check payable to: Carolina Water Service Inc of SC

Messages

The Company is under the jurisdiction of the PSC. You may contact the ORS at 800-922-1531 with any complaints that remain unresolved after 7 days.

349



PO BOX 160609
Altamonte Springs, FL 32716



Account Number:	[REDACTED]	Amount Paid
Due Date:	10/25/2010	
Please Pay:	\$74.91	

8 MISCHIEF ST
LAKE WYLIE SC 29710

Carolina Water Service Inc of SC
PO Box 11025
Lewiston ME 04243-9476



☐ Address correction requested on back